

**Washington Department of Ecology  
Hazardous Waste & Toxics Reduction Program  
Compliance Report**

**Site: All American Metal Finishing****RCRA ID#: WAH 000 025 753**

Inspection Date: September 25, 2007  
Site Contacts: Dave Amlin  
Phone: (253) 854-2170  
E-mail: [Walnetto15@aol.com](mailto:Walnetto15@aol.com)  
Site Location: 926 5th Ave S  
Kent, WA  
At This Site Since: 2007  
Generator/Site Status: LQG

NAICS#: 332813  
Zinc Electroplating

**Ecology**

Lead Contact: Daylin Davidson  
E-mail: [DayD461@ecy.wa.gov](mailto:DayD461@ecy.wa.gov)  
Report Date: October 8, 2007  
Report By: Daylin Davidson

Phone: (425) 649-7090 FAX: (425) 649-7218  
Other Representatives: Warren Walton

(Signed)

(Date)

**Facility Background:**

All American Metal Finishing moved to this location during the week of September 3<sup>rd</sup> of this year, approximately three weeks prior to this inspection. The company was previously located at 1819 Central Avenue South, also in Kent. Five employees work one shift as commercial zinc platers and the company has many clients (machine shops, fabrication shops, sheet metal shops) including Genie Industries.

All American Metal Finishing received a Hazardous Waste Compliance inspection from the Department of Ecology at its previous location in 1994 and 2004. Hazardous Waste violations observed during the 2004 inspection were for failure to conduct weekly inspections and daily tank inspections, apply labels to containers, and maintain a personnel training plan.

**Inspection Summary:**

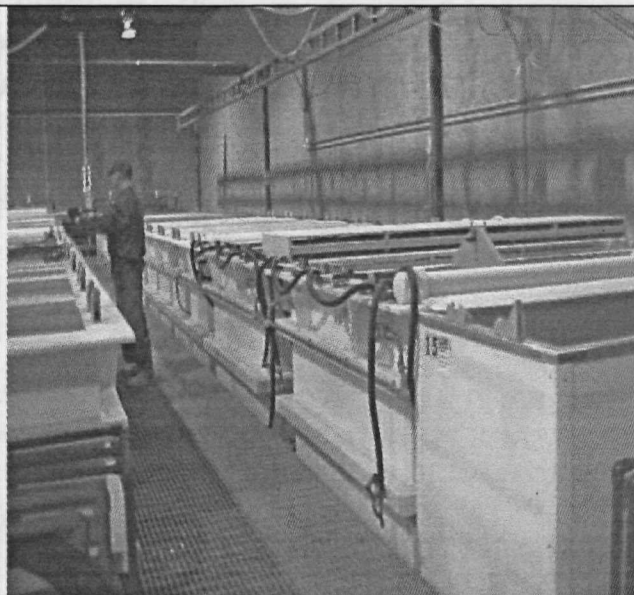
We arrived on site at 9:45 a.m. and asked to speak to Dave Amlin, the owner of the company. We explained the reason for our visit to Mr. Amlin and proceeded on a site tour.

Mr. Amlin told us that they had just moved to this facility three weeks ago and that the waste treatment line was not functioning due to equipment malfunction. Therefore, the only waste we observed on-site was the liquid in the two storage tanks awaiting treatment. Mr. Amlin told us the following about the facility's processes and waste streams:


- Zinc electroplating wastewater from the tank line is the primary waste generated. This waste is treated on site with neutralization, settling, pressing, and evaporation.
- Zinc wastewater sludge from the filter press is taken by Envirotech as a special waste (WT02) to the Columbia Ridge landfill in Oregon.
- Liquids and sludge from the evaporator are taken by Philip Services as corrosive (D002) wastes to Tacoma.
- Zinc electroplating process tank filters and filter cartridges are managed as a special waste (WSC2).
- Spent sodium and fluorescent bulbs have been disposed of in the trash.

In this new facility, there is only one plating line that runs down one side of the building and up the other. There are two 1,000 gallon dangerous waste tanks in the bermed area next to the plating tanks.

**USEPA SF****1341242**

<p>Photo 1 of 2</p> <p>Mvc-001f.jpg 10:38 a.m.</p> <p>Plating Line</p>	<p>From office area looking down right side of plating line.</p>	
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Mr. Amlin told us that wastewaters are pumped from the tank line to the first tank for neutralization treatment of the wastewaters. Then they are pumped into the second tank for settling and separation. During this process, the metal hydroxides fall out. The metal hydroxides portion is then put through a filter press and the sludge will be put into totes for transport and disposal as a special waste sludge. Lastly, the remaining liquid is pumped into the evaporator. These waters are re-circulated until the salts start to plug up the evaporator. Then, the evaporator is cleaned out and the wastes are pumped out by Philip Services and shipped off for disposal.

<p>Photo 2 of 2</p> <p>Mvc-002f.jpg 10:38 a.m.</p> <p>Chemical Line</p>	<p>From office area looking down left side of chemical line.</p> <p>Note two chemical process tanks, a sludge press, and water evaporator in this photo.</p>	
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#### Hazardous Waste Accumulation Area

The accumulation area is next to the filter press, but outside the berm. Mr. Amlin told us he would be bringing a tote over from the old location to hold filter cake generated from the filter press process. He said a box for storing dangerous waste filters and cartridges will also be located here. We observed spill equipment near this area and noted verbal emergency communication would be possible from any location in the building except the office.

#### Records Review

As no waste had been treated or disposed of from the site since operations began three weeks ago, there were no manifests to review. Similarly, there were no weekly inspection logs for the hazardous waste storage area nor waste treatment logs. Mr. Amlin told us that visual inspections of the tanks are made daily, but had not been logged.

Waste designation records were still stored at the old facility.

Neither a contingency plan nor written training plans were available. Mr. Amlin told us the training plans would be brought from the old facility and used as they are for the new facility. He indicated a new contingency plan would need to be created for the new facility.

Mr. Amlin told us spent sodium and fluorescent bulbs have not been managed as dangerous or universal wastes.

We reviewed our findings with Mr. Amlin and left the site at 10:45 a.m.

#### Additional Information

- King County does not allow disposal of fluorescent bulbs as solid waste. Universal wastes are certain dangerous wastes that are able to be managed appropriately under less stringent regulatory requirements if they are recycled. For light bulbs, the rule includes, but is not limited to fluorescent tubes, compact fluorescent, mercury vapor, metal halide, high pressure sodium and neon lamps. The benefits of managing the lamps as universal waste include no counting, no manifesting, no reporting on annual reports and a 12-month accumulation time. To manage your used bulbs as Universal Waste, please store them so that they will not be broken and label their container with the words "Universal Waste Lamps" and the start date when the first item was placed in the container to ensure they are recycled within the 12-month accumulation time limit. *Small quantities of universal wastes can be taken by the generator directly to a local recycler, such as those listed inside the enclosed publication.*
- The bin used to catch the filter cake under the press should be labeled as hazardous waste and with a risk label before any filter cake is put in it.

### COMPLIANCE PROBLEMS

The following conditions identified during the inspection were not in compliance with Dangerous Waste and/or other environmental laws. Each problem is covered in three parts: (1) the **citation from the regulations**, (2) the **specific observations** from the inspection, and (3) the **corrective measures** needed to fix the problem and achieve compliance.

**1) WAC 173-303-640(6)(b): Dangerous waste tank storage systems must be inspected daily per 640(6)(b), and the inspection should be documented with an inspection log per 640(6)(d).**

Mr. Amlin told us that visual inspections of the waste tanks are made daily, but had not been logged.

*Within 7 days of receipt of this letter, develop an inspection log (or modify an existing one) to record dangerous waste tank inspections. The log shall include the date and time of the inspection, the signature of the inspector, a notation of the observations made and the date and nature of any corrective measures taken. The tank inspections must include all above ground and accessible portions of the system, including secondary containment, to detect corrosion, structure failures or releases, and record data gathered from monitoring equipment. Submit a copy of three weeks worth of completed daily tank logs within 30 days.*

**2) WAC 173-303-573(9): Universal wastes must be managed in a way that prevents releases of universal waste or component of a universal waste to the environment, as required by this subsection.**

Mr. Amlin told us spent sodium and fluorescent bulbs have not been managed as dangerous or universal wastes.

*Within 30 calendar days of the receipt of this letter properly manage universal waste in a way that prevents releases to the environment, as described in WAC 173-303-573(9). Submit a photo of the storage area set up for the universal waste and provide the name of the facility that the waste will be taken to.*

**3) WAC 173-303-200(1)(e) and by reference 330: Training requirements were not met. The facility should have a training program, a written training plan, and keep training records.**

Training plans and records were not available. Mr. Amlin told us the training plans would be brought from the old facility and used for the new facility.

*Within 30 calendar days of the receipt of this letter, develop a dangerous waste training program which shall include a written training plan and records per WAC 173-303-330.*

**4) WAC 173-303-350(2) as referenced by 200(1)(e): A contingency plan was not prepared.**

No contingency plan had been prepared for this facility.

*Within 60 calendar days of the receipt of this letter, develop and retain on-site a contingency plan per the requirements of WAC 173-303-350. Submit a copy of the contingency plan within 60 days.*

## COMPLIANCE CERTIFICATE

### **Instructions: Return this Completed Form**

The problems listed above are repeated below and must be corrected in order to be in compliance with Washington Dangerous Waste Regulations. Complete the shaded portion of the table by initialing and indicating the date each action is completed, and **briefly explain the actions taken for each item in a cover letter**. Mail this completed form, the cover letter, and any requested documentation by **December 10, 2007** to: Daylin Davidson, Department of Ecology, Hazardous Waste Program, 3190 160<sup>th</sup> Avenue SE, Bellevue, WA 98008-5452. (An extension of the deadlines may be requested. Please e-mail a request to [DayD461@ecy.wa.gov](mailto:DayD461@ecy.wa.gov) before the date specified above.)

**1) WAC 173-303-640(6)(b): Dangerous waste tank storage systems must be inspected daily per 640(6)(b), and the inspection should be documented with an inspection log per 640(6)(d).**

*Within 7 days of receipt of this letter, develop an inspection log (or modify an existing one) to record dangerous waste tank inspections. The log shall include the date and time of the inspection, the signature of the inspector, a notation of the observations made and the date and nature of any corrective measures taken. The tank inspections must include all above ground and accessible portions of the system, including secondary containment, to detect corrosion, structure failures or releases, and record data gathered from monitoring equipment. Submit a copy of three weeks worth of completed daily tank logs within 30 days.*

Compliance Item	Corrective Measures Deadline	Date Completed	Initials
WAC 173-303-640(6)(b)	October 17, 2007		

**2) WAC 173-303-573(9): Universal wastes must be managed in a way that prevents releases of universal waste or component of a universal waste to the environment, as required by this subsection.**

*Within 30 calendar days of the receipt of this letter properly manage universal waste in a way that prevents releases to the environment, as described in WAC 173-303-573(9). Submit a photo of the storage area set up for the universal waste and provide the name of the facility that the waste will be taken to.*

Compliance Item	Corrective Measures Deadline	Date Completed	Initials
WAC 173-303-573(9)	November 10, 2007		

**3) WAC 173-303-200(1)(e) and by reference 330: Training requirements were not met. The facility should have a training program, a written training plan, and keep training records.**

*Within 30 calendar days of the receipt of this letter, develop a dangerous waste training program which shall include a written training plan and records per WAC 173-303-330.*

Compliance Item	Corrective Measures Deadline	Date Completed	Initials
WAC 173-303-200(1)(e)	November 10, 2007		

4) WAC 173-303-350(2) as referenced by 200(1)(e): A contingency plan was not prepared.

*Within 60 calendar days of the receipt of this letter, develop and retain on-site a contingency plan per the requirements of WAC 173-303-350. Submit a copy of the contingency plan within 60 days.*

Compliance Item	Corrective Measures Deadline	Date Completed	Initials
WAC 173-303-350(2)	December 10, 2007		

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